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Attorney for Defendant  
Cody. Cramer

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	) Case No. 2:21-cr-00155-JAM
	)
Plaintiff,	) <b>STIPULATION AND ORDER TO CONTINUE</b>
	) <b>STATUS CONFERENCE AND EXCLUDE TIME</b>
vs.	)
	) Date: August 20, 2024
JOSHUA WILSON and	) Time: 9:00 a.m.
CODY CRAMER,	) Judge: Hon. John A. Mendez
	)
<u>Defendants.</u>	)

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody Cramer that the status hearing currently set for August 20, 2024, at 9:00 be continued to September 17, 2024, at 9:00 a.m.

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on August 20, 2024, at 9:00 a.m.
2. By stipulation, Mr. Cramer now moves to continue the **status conference** to **September 17, 2024, at 9:00 a.m.**

3. To date, the government has produced approximately 850 pages and various audio/video recordings of discovery to the defendants.
4. Mr. Wilson and Mr. Cramer require additional time to review the discovery, investigate and research possible defenses, research potential pretrial motions, and explore potential resolutions to the case, and otherwise prepare for trial.
5. Counsel for Mr. Wilson just completed a trial that consumed a great deal of preparation time and Mr. Cramer recently had neck surgery that has delayed work on a resolution of this matter.
6. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
7. Neither the government nor Mr. Wilson object to the continuance.
8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between August 20, 2024 and September 17, 2024, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public, Mr. Wilson, and Mr. Cramer in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: August 12, 2024

/s/ Hootan Baigmohammadi  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Mr. Wilson

Date: August 12, 2024

/s/ Kyle Knapp  
Kyle Knapp  
Attorney for Mr. Cramer

1  
2 Date: August 12, 2024

PHILLIP A. TALBERT  
United States Attorney

3 /s/ James R. Conolly  
4 James R. Conolly  
5 Assistant United States Attorney  
6 Attorneys for Plaintiff  
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8 **ORDER**

9  
10 The Court, having received and considered the parties' stipulation, and good cause appearing  
11 therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.  
12 IT IS SO ORDERED.

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14 Dated: August 14, 2024

/s/ John A. Mendez  
15 THE HONORABLE JOHN A. MENDEZ  
16 SENIOR UNITED STATES DISTRICT JUDGE  
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